John W. Hickenlooper, Governor Larry Wolk, MD, MSPH **Executive Director and Chief Medical Officer**

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S. Denver, Colorado 80246-1530 Phone (303) 692-2000

Laboratory Services Division 8100 Lowry Blvd.

Denver, Colorado 80230-6928

Located in Glendale, Colorado (303) 692-3090 Colorado Department of Public Health and Environment

September 16, 2016

www.colorado.gov/cdphe

Mr. Joe Castro Facilities and Fleet Manager Department of Public Works 1720 13th Street, PO Box 791 Boulder, Colorado 80306

Re: Voluntary Cleanup, Second Interim Remediation Report, 13th Street Plaza Site, Boulder, Boulder County, Colorado, Site ID RV130403-1

Dear Mr. Castro,

The Colorado Department of Public Health and Environment (the "Department") has reviewed the Second Interim Remediation Report for the 13th Street Plaza Site. This report was submitted on behalf of City of Boulder (the Applicant) concerning the property identified in the application and known as the 13th Street Plaza Site, Boulder, Boulder County, Colorado (the site). This review was limited to the materials submitted by the Applicant, as well as those materials required by 25-16-304(2) C.R.S.

Additional remediation is necessary and appropriate to address the residual dissolved phase VOC and SVOC impacts from the historic manufactured gas plant. As you are aware, the VCP has long term goals for sites with organic ground water contamination to meet applicable ground water standards at the property boundaries. CDPHE believes that standard monitored natural attenuation at this site will result in a significant number of decades of monitoring and that active treatment, as recommended by the city's consultant is warranted and agrees with the proposal for additional treatments.

CDPHE would like to see more detailed quarterly reporting of ground water monitoring events. This reporting should include quarterly ground water flow maps, consistent field parameter monitoring which routinely includes dissolved oxygen and oxidation/reduction potential parameters. CDPHE would also like to see these parameters monitored in well #13 for the Art Cleaners site. This well is located downgradient from the 13th Street Plaza site and upgradient of the Art Cleaners site. This will aid in assessing travel time and changes in those conditions with respect to the 13th Street Plaza Site.

If you have any questions, please call me at (303) 692-3311.

Sincerely,

Mark Rudolph

Voluntary Cleanup Program

cc: Elizabeth Temkin, Esq. Michelle DeVoe Quinn Kilty Site File

TWHL Public Service Company of Colorado RV130403-1